



81 Main Street, Suite 215 | White Plains, NY 10601
Tel: 914.686.4800 | Fax: 914.686.4824

MICHAEL W. FREUDENBERG, PARTNER
mfreudenberg@homlegal.com

July 7, 2020

Via ECF

Hon. Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15C
New York, NY 10007

The initial pretrial conference scheduled for July 14, 2020 is hereby CANCELLED.

Plaintiff is directed to submit a motion for default judgment in accordance with this Court's Individual Practices in Civil Cases by July 29, 2020. SO ORDERED.

Re: Worthy Global Limited v. Marcraft Cloths, Inc.
d/b/a Marcraft Apparel Group
Civil Action No. 20-cv-3365 (LJL)

LEWIS J. LIMAN
United States District Judge

July 8, 2020

Dear Judge Liman:

Our firm represents Plaintiff Worthy Global Limited ("Plaintiff") in the above referenced matter.

We are writing to request an adjournment of the Initial Pretrial Conference by telephone currently scheduled for July 14, 2020, at 10:30 a.m., before Your Honor.

The reason for this request for adjournment is because Defendant Marcraft Cloths, Inc. d/b/a Marcraft Apparel Group ("Defendant") has defaulted in appearance in the above captioned action. Defendant was properly served under Fed. R. C. P. 4 on May 5, 2020, and proof of service had been filed with the Court. Defendant has not answered or otherwise moved with respect to the Complaint, and time for Defendant to answer or otherwise move has not been extended. We will be filing a Request for a Clerks' Certificate of entry of default against Defendant. Upon the Clerk's entry of default against Defendant, we will be filing a motion for default judgment against Defendant.

This is Plaintiff's first request for an adjournment of the Initial Pretrial Conference. We are not able to obtain consent from the Defendant as Defendant has not made its appearance in this action. As a result, Plaintiff is also not able to submit a joint proposed Case management and Scheduling Order, which is to be submitted one week prior to the original set date of the Initial Pretrial Conference. Besides this deadline, there are no other scheduled dates in this action.

We thank the Court in advance for its consideration.

Respectfully submitted,

s/Michael W. Freudenberg

Michael W. Freudenberg

MWF:sbt